

Remarks

Claim objections 35 USC § 101

Claims 41-43 have been amended to specify that the storage medium is non-transitory. The Examiner's helpful suggestion in this regard is appreciated.

Claim rejections 35 USC § 103

All of the claims are rejected based on a reading of Delaney which is alleged to disclose feature (a) of claim 1, or the equivalently worded feature of the other independent claims. It is respectfully submitted that Delaney in fact fails to teach or suggest the elements of paragraph (a) of claim 1 for the reasons given below.

The "contact information entity" of claim 1 is a single entity having the following two essential characteristics: firstly, it is accessible across the network; and secondly, it comprises "information sufficient to enable each node to determine whether it has the resources to service the contact".

Claim 1 has been amended to ensure that each of these two characteristics is clearly specified as a separate requirement of the contact information entity. Each other independent claim has been amended in line with claim 1.

The Examiner in the office action interpreted Delaney as disclosing:

- 1) A contact information entity which is accessible across the network and which comprises information
- 2) Sufficient to enable each node to determine whether it has the resources to service the contact

It is submitted that the interpretation of the claim which segmented it into "a contact information entity which is accessible across the network and which comprises information", and as a separate element "sufficient to enable each node to determine whether it has the resources to service the contact", does not provide a claim

interpretation which meets the standard of being the broadest reasonable interpretation of the claims which is also consistent with the interpretation that those skilled in the art would reach (MPEP 2111). The division above is artificial and accordingly the claim as amended is re-worded to rule out such an interpretation.

It was alleged that Delaney disclosed (1) at paragraph [0116] in respect of a database updating function within the network management server. It was then indicated that Delaney disclosed (2) at paragraphs [0069] and [0071] where there is disclosure of a determination, carried out at a contact centre (not the network management unit), as to whether resources exist at the contact center to efficiently handle a contact.

It is submitted that the claimed contact information entity cannot be both a database function in one part of the network and simultaneously or also a determination function carried out at a separate point in the network.

It is further submitted that the amended claim wording clarifies beyond doubt that the contact information entity is a coherent entity which has the joint characteristics of both being accessible across the network and of comprising information sufficient to enable each node to determine whether it has the resources to service the contact.

Furthermore, taking the argument made in the office action at face value, it is pointed out that the database updating function is contained entirely within the network management server and is not “accessible across the network” as alleged.

Neither the database updating function of [0116], nor the determining step of [0069] and [0071] is a contact information entity as claimed, and nor can these two separate parts of Delaney be validly considered to be related in any way which would allow them to be considered in combination to be such an entity.

Delaney therefore fails to provide any teaching of a contact information entity as claimed.

This point can be seen further in the part of the rejection relating to the element of claim 1, paragraph (a) which reads: “whereby said contact centre can determine whether its agents can service a given contact, based on said contact information entity and the identified skills of the contact center’s agents”.

The office action alleges that this integer is found simply with reference to paragraphs [0116] and [0122]. Paragraph [0116] is the disclosure of a database and updating function within the network management server of Delaney. That database stores information about each contact centre (e.g. IP and network addresses, telephone numbers, number of agents, aggregate and individual skillsets, current agent status). Paragraph [0122] indicates that when the network management server (not the contact center) is seeking to transfer a call to a remote contact centre, it can examine the aggregate skillset record for each of the contact centers, draw up a shortlist of agents in each contact center, and select a suitable agent.

All of this happens within the network management unit and without the contact center being involved. Delaney’s contact centers do not have access to the contents of the network management unit database. The information in that database is not made available across the network. The individual contact centers therefore cannot “determine whether its agents can service a given contact, based on said contact information entity”. This argument is made without prejudice to the further argument that the database and the updating function do not contain information about a contact, only about the status and abilities of agents and contact centers.

Accordingly, paragraph (a) is not in fact taught or suggested by Delaney, which fails to disclose a contact information entity having the specified characteristics and which fails to teach the contact centers determining, from information about a contact available across the network, whether they can service that contact.

The above features are also not taught by Taylor which is concerned only with auctioning the rights to carry telephone calls between competing carriers.

Accordingly, whether taken alone or in combination, Delaney and Taylor cannot render obvious the claimed invention.

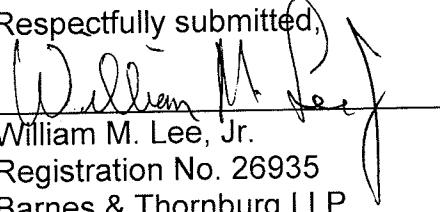
For completeness it is also pointed out that neither Rowstron, Robinson, Ausubel nor Wu provide the teaching missing from both Delaney and Taylor as regards claim 1.

Each other independent claim is rejected based on at least a combination of Delaney and Taylor, and therefore the above arguments apply to each other claim in the application which share at a minimum the contact information entity of claim 1, or contact information received across the network having the same characteristics as the claim 1 contact information entity.

In view of the amendments and arguments made herein, the applicants respectfully request the examiner withdraw the rejections, and allow the application.

As this response is being submitted during the fourth month following the Examiner's Office Action, an appropriate petition for extension of time is also submitted herewith.

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Respectfully submitted,

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